

**From:** [kira.dabby@lw.com](mailto:kira.dabby@lw.com)  
**To:** [Cora, Lori](#); [Koch, Kristine](#)  
**Cc:** [Eric.Albert@usdoj.gov](mailto:Eric.Albert@usdoj.gov); [KIRK.WILKINSON@lw.com](mailto:KIRK.WILKINSON@lw.com); [Grant.Cohen@lw.com](mailto:Grant.Cohen@lw.com); [Brian.Nowak@lw.com](mailto:Brian.Nowak@lw.com)  
**Subject:** RE: Second Request for Information -- DIL Trust -- Portland Harbor Superfund site  
**Date:** Monday, May 11, 2015 11:40:42 AM  
**Attachments:** [TDT0016204.pdf](#)

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Kristine:

Attached please find a cover letter for DIL Trust's supplemental production in response to the 104(e) Second Information Request from EPA. You will receive an email from Brian Nowak with a link transmitting the supplemental production by Secure Transfer. We will also forward a hard copy of the letter and a CD with the supplemental production.

Thank you,  
Kira

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**From:** Dabby, Kira (NY)  
**Sent:** Thursday, January 15, 2015 6:56 PM  
**To:** Cora, Lori; Koch, Kristine  
**Cc:** Albert, Eric (ENRD); Wilkinson, Kirk (LA)  
**Subject:** Second Request for Information -- DIL Trust -- Portland Harbor Superfund site

Kristine:

Attached please find, in pdf format, DIL Trust's Response to the 104(e) Second Information Request from EPA. We will send a compact disc containing our Response along with the referenced Exhibits by Federal Express tomorrow. An original signature on the Declaration will accompany that transmittal.

Thank you,  
Kira

**Kira S. Dabby**

**LATHAM & WATKINS LLP**  
885 Third Avenue  
New York, NY 10022-4834  
Direct Dial: +1.212.906.4595  
Fax: +1.212.751.4864  
Email: [kira.dabby@lw.com](mailto:kira.dabby@lw.com)  
<http://www.lw.com>

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Latham & Watkins LLP

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Kira S. Dabby  
Direct Dial: +1.212.906.4595  
kira.dabby@lw.com

**LATHAM & WATKINS** LLP

53rd at Third  
885 Third Avenue  
New York, New York 10022-4834  
Tel: +1.212.906.1200 Fax: +1.212.751.4864  
www.lw.com

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File No. 015028-0026

May 11, 2015

Ms. Kristine Koch  
Remedial Project Manager  
United States Environmental Protection Agency, Region 10  
Office of Environmental Cleanup, Mail Code: ECL-115  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

Re: Second Information Request: Portland  
Harbor Superfund Site

Dear Ms. Koch:

This letter is in further response to the § 104(e) Second Information Request dated November 26, 2014 directed to The DIL Trust ("DIL Trust") relating to the Portland Harbor Superfund Site. DIL Trust responded to the § 104(e) Second Information Request on January 15, 2015. We write to supplement our response with the attached documents.

Attached hereto as **Supplemental Exhibit A** please find information within DIL Trust's possession related to Albina Engine & Machine Works' ("Albina") and/or Dillingham Ship Repair's ("DSR") operations and activities at the Portland Harbor Superfund Site.

Attached hereto as **Supplemental Exhibit F** is evidence of a policy that may provide insurance coverage related to the Site.

Attached hereto as **Supplemental Exhibit G** is an updated chart listing policies known to counsel for DIL Trust, which were issued to DIL Trust, Dillingham Corporation, Albina, or DSR, and which may provide insurance coverage related to the Site.

Attached hereto as **Supplemental Exhibit H** are additional communications between DIL Trust and insurers regarding the policies referenced in Supplemental Exhibit G. Supplemental Exhibit H includes communications initiated by counsel for DIL Trust or on DIL Trust's behalf

Please do not hesitate to call Kirk Wilkinson at (213) 891-8234 if you have any further questions. Kirk would welcome the opportunity to discuss this information.

Sincerely,



Kira S. Dabby  
of LATHAM & WATKINS LLP

Enclosure

**TDT0016204**